



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX**

75 Hawthorne Street  
San Francisco, CA 94105

July 28, 2015

Ms. Erin Phelps  
Project Manager  
Flagstaff Ranger District  
Coconino National Forest  
5075 North Highway 89  
Flagstaff, Arizona 86004

Subject: Final Environmental Impact Statement for the Flagstaff Watershed Protection Project,  
Coconino County, Arizona (CEQ#20150180)

Dear Ms. Phelps:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

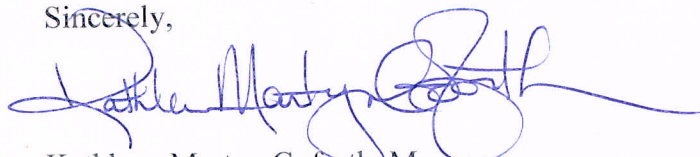
The EPA reviewed the Draft Environmental Impact Statement and provided comments to the Forest Service on August 18, 2014. We rated the proposed action and the DEIS as Environmental Concerns – Insufficient Information (EC-2) due to concerns regarding potential impacts to water resources from cable logging treatments. We recommended that the Forest Service avoid the use of cable logging and consider a blend of the minimalist approach of Alternative 4 with the more targeted, specialized steep-slope treatments of Alternative 3. We also recommended that the Forest Service include estimates, in the Final EIS, of the greenhouse gas emissions that would result from project activities.

We thank the Forest Service for the responses, included in the FEIS, to the concerns that we raised in our comments on the DEIS. In particular, we appreciate the additional information provided on the potential use of cable logging to achieve project objectives. We are pleased that the draft Record of Decision proposes a reduction in the use of cable logging, from what was proposed in the DEIS, and specifically, that no cable logging would occur within Mexican spotted owl protected activity centers and on Mormon Mountain.

The Forest Service responded to our recommendation about estimating greenhouse gas emissions by stating that the Arizona Department of Environmental Quality does not require analysis or regulation of greenhouse gas emissions from project activities. Please note that, on December 18, 2014, the White House Council on Environmental Quality (CEQ) released revised draft guidance on how federal agencies should consider the effects of greenhouse gas emissions and climate change in National Environmental Policy Act reviews of their proposed actions. The revised draft guidance supersedes the draft guidance issued by CEQ in February 2010 and applies to all federal agency actions, including land and resource management actions. The revised draft guidance advises federal agencies that, to remain consistent with NEPA, they should consider the extent to which a proposed action and its reasonable alternatives contribute to climate change through GHG emissions.

We appreciate the opportunity to review this FEIS. If you have any questions, please contact me at (415) 972-3521, or contact Jason Gerdes, the lead reviewer for this project. Mr. Gerdes can be reached at (415) 947-4221 or [gerdes.jason@epa.gov](mailto:gerdes.jason@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathleen Martyn Goforth", with a long horizontal flourish extending to the right.

Kathleen Martyn Goforth, Manager  
Environmental Review Section